

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
VL Wind Down Inc., <i>et al.</i>,¹)	Case No. 19-12670 (JTD)
)	
Debtors.)	Jointly Administered
)	
_____)	
)	
Peter Hurwitz, as Liquidating)	
Trustee of VL Wind Down)	
Creditors' Liquidating Trust,)	
)	
)	
Plaintiff,)	
)	
v.)	Adv. Pro. No. 21-51310 (JTD)
)	
James Cantrell and Vintage)	
Exotics, LLC (d/b/a Vintage)	
Exotics Competition Engineering),)	
)	
)	
Defendants.)	
_____)	

**STIPULATION BETWEEN PLAINTIFF AND DEFENDANTS
EXTENDING RESPONSE TIME AND WAIVING CERTAIN DEFENSES**

WHEREAS, on December 10, 2021, Peter Hurwitz, as Liquidating Trustee of VL Wind Down Creditors' Liquidating Trust ("Plaintiff") initiated this adversary proceeding by filing his *Adversary Complaint* [Adv. Docket No. 1] (the "Complaint"); and

WHEREAS, James Cantrell and Vintage Exotics, LLC (d/b/a Vintage Exotics Competition Engineering) ("Defendants") agree to waive their defenses, if any, pursuant to Federal Rules of Civil Procedure 12(b)(4) and 12(b)(5), as incorporated into this adversary proceeding by Federal Rule of Bankruptcy Procedure 7012(b);

¹ The Debtors in these chapter 11 cases are VL Wind Down Inc. (f/k/a Vector Launch Inc.) and GSC Wind Down Inc. (f/k/a Garvey Spacecraft Corporation).

WHEREAS, Defendants reserve all rights and defenses, except those defenses explicitly waived herein; and

WHEREAS, Plaintiff agrees to extend Defendants' time to answer, move, or otherwise respond to the Complaint by twenty-eight (28) days, through and including March 24, 2022.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, pursuant to Local Rule 7012-2, that:

1. Defendants hereby waive their defenses, if any, pursuant to Federal Rules of Civil Procedure 12(b)(4) and 12(b)(5), as incorporated into this adversary proceeding by Federal Rule of Bankruptcy Procedure 7012(b);

2. Defendants reserve all rights and defenses, except those defenses explicitly waived herein; and

3. Defendants' time to answer, move, or otherwise respond to the Complaint is hereby extended through and including March 24, 2022.

February 24, 2022
Wilmington, Delaware

February 24, 2022
Wilmington, Delaware

CHIPMAN BROWN CICERO & COLE, LLP

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